

1 Shylah R. Alfonso (admitted *pro hac vice*)  
2 SAlfonso@perkinscoie.com  
3 Tiffany Lee, Bar No. 303007  
4 TiffanyLee@perkinscoie.com  
5 1201 Third Avenue, Suite 4900  
6 Seattle, WA 98101-3099  
7 Telephone: 206.359.8000  
8 Facsimile: 206.359.9000  
9 PERKINS COIE LLP

10 Attorneys for Defendant  
11 LINKEDIN CORPORATION  
12 [additional counsel listed below signature]

13 Brian J. Dunne, Bar No. 275689  
14 bdunne@bathaeedunne.com  
15 Edward M. Grauman, (admitted *pro hac vice*)  
16 egrauman@bathaeedunne.com  
901 South MoPac Expressway  
Barton Oaks Plaza I, Suite 300  
Austin, TX 78746  
Phone: (213) 462-2772

17 Attorneys for Plaintiffs  
18 TODD CROWDER, KEVIN SCHULTE, and  
19 GARRICK VANCE, on behalf of the putative class  
20 [additional counsel listed below signature]

21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

TODD CROWDER, KEVIN SCHULTE,  
and GARRICK VANCE, on behalf of  
themselves and all others similarly situated,

Plaintiffs,  
v.

LINKEDIN CORPORATION,

Defendant.

Case No. 4:22-cv-00237-HSG

**STIPULATED REQUEST AND  
ORDER RE LEAVE TO FILE  
SUPPLEMENTAL BRIEFS [CIVIL L.R.  
7-3(d), 7-12]**

Judge: Hon. Haywood S. Gilliam, Jr.

1 IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

2 WHEREAS, on May 10, 2023, Defendant LinkedIn Corporation (“LinkedIn”) filed a  
3 Motion to Dismiss Plaintiffs’ First Amended Complaint for failure to state a plausible claim.  
4 Dkt. No. 73. The motion was fully briefed on June 21, 2023, and the Court heard the motion on  
5 July 27, 2023;

6 WHEREAS, on July 28, 2023, the Court issued an order partially lifting the stay of  
7 discovery and instructing LinkedIn to “produce to Plaintiffs any private API agreements  
8 between LinkedIn and HootSuite, Amobee, Annalect, Ogilvy, or Sprinklr by August 10, 2023.  
9 All other discovery beyond the production of these specified private API agreements remains  
10 stayed unless otherwise ordered.” Dkt. No. 78;

11 WHEREAS, pursuant to the Court’s order, LinkedIn produced certain API agreements  
12 to Plaintiffs on August 10, 2023; and

13 WHEREAS, the parties met and conferred on August 11, 2023, and agreed that it would  
14 assist the Court to provide copies of the API agreements and to provide the parties’ respective  
15 views of how those agreements should inform the Court’s analysis of LinkedIn’s motion, if at  
16 all;

17 NOW THEREFORE, the parties, by and through their attorneys, stipulate and agree  
18 pursuant to Civil Local Rule 7-3(d) and 7-12 that, subject to the Court’s approval, the parties  
19 shall be permitted to file supplemental briefs of no more than five (5) pages each, limited to  
20 discussing the recently-produced API agreements and their impact, if any, on LinkedIn’s  
21 motion. The parties shall file their briefs by 5:00 p.m. Pacific time, five (5) business days after  
22 the Court’s order granting leave. LinkedIn’s brief will attach copies of the API agreements or  
23 representative excerpts thereof as agreed to by Plaintiffs.

24 IT IS SO STIPULATED.

25 DATED: August 14, 2023

PERKINS COIE LLP

26 By: /s/ Shylah R. Alfonso  
27 Shylah R. Alfonso

1 Shylah R. Alfonso (admitted *pro hac vice*)  
2 SAlfonso@perkinscoie.com  
3 Tiffany Lee, Bar No. 303007  
4 TiffanyLee@perkinscoie.com  
5 1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Telephone: 206.359.8000  
Facsimile: 206.359.9000

6 Elliott J. Joh, Bar No. 264927  
7 EJoh@perkinscoie.com  
8 Lauren Trambley, Bar No. 340634  
LTrambley@perkinscoie.com  
9 505 Howard Street, Suite 1000  
San Francisco, CA 94105-3204  
Telephone: 415.344.7000  
Facsimile: 415.344.7050

10  
11 Jon B. Jacobs (admitted *pro hac vice*)  
12 JBJacobs@perkinscoie.com  
13 700 13th Street, NW  
Suite 800  
14 Washington, D.C. 20005-3960  
Telephone: 202.654.6200  
15 Facsimile: 202.654.6211

16 Attorneys for Defendant  
17 LINKEDIN CORPORATION

18 DATED: August 14, 2023 BATHAEE DUNNE LLP

20 By: /s/ Brian J. Dunne  
21 Brian J. Dunne

22 Brian J. Dunne, Bar No. 275689  
23 bdunne@bathaeedunne.com  
24 Edward M. Grauman, (admitted *pro hac vice*)  
egrauman@bathaeedunne.com  
25 901 South MoPac Expressway  
Barton Oaks Plaza I, Suite 300  
Austin, TX 78746  
26 Phone: (213) 462-2772

27 Yavar Bathaee, Bar No. 282388  
28 yavar@bathaeedunne.com

1 Andrew C. Wolinsky, (admitted *pro hac vice*)  
2 awolinsky@bathaeedunne.com  
3 445 Park Avenue, 9th Floor  
4 New York, NY 10022  
5 Tel.: (332) 322-8835

6  
7 Attorneys for Plaintiffs  
8 TODD CROWDER, KEVIN SCHULTE, and  
9 GARRICK VANCE, on behalf of the putative class

10 **Local Rule 5-1(h)(3) Attestation**

11 I, Elliott J. Joh, the filer of this document, attest that each of the signatories to this document  
12 have concurred in the filing of this document.

13  
14 /s/ Elliott J. Joh  
15 Elliott J. Joh

16 Dated: 8/15/2023



17 HAYWOOD S. GILLIAM, JR.  
18 United States District Judge